



Consulting Engineers
and Scientists

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

March 11, 2010
(PBW Project No. 1584)

VIA COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: February 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation of the Final Baseline Human Health Risk Assessment Report dated February 8, 2010 based on EPA comments on a August 31, 2009 draft of that document as provided in your letter dated January 14, 2010; (2) preparation of the Final Screening-Level Ecological Risk Assessment (SLERA) Report (to be submitted by March 11, 2010) based on EPA comments on a December 22, 2009 revision of that document as provided in your letter dated February 24, 2010; (3) preparation of a Draft Baseline Ecological Risk Assessment (BERA) Problem Formulation Report (to be submitted by March 11, 2010); and (4) preparation of a Draft BERA Work Plan and Sampling and Analysis Plan (to be submitted by March 11, 2010).
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.



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3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – performance of the following ecological risk assessment activities: (1) preparation of the Final SLERA Report; (2) preparation of the Draft BERA Problem Formulation Report; and (3) preparation of the Draft BERA Work Plan and Sampling and Analysis Plan.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, representatives of the Respondents listed above met with you and Ms. Barbara Nann on February 8, 2010 to discuss finalization of an Administrative Settlement Agreement and Order on Consent for Removal Action (Removal Action AOC). A revised Draft Work Plan for that Removal Action was submitted to you on February 18, 2010 in response to comments provided by you in a telephone conversation on February 9, 2010. Proposed revised wording for the Removal Action AOC (as requested in the February 8, 2010 meeting) was provided to Ms. Nann on February 19, 2010. Based on the timing for finalization of the Removal Action AOC, other activities beyond those described above may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP